IN THE UNITED STATES DISTRICT COURT FOR THE
WESTERN DISTRICT OF MISSOURI
WESTERN DIVISION

UNITED STATES OF AMERICA, Plaintiff, v. ISSE AWEIS MOHAMUD, Defendant.	Case No. 17-MJ-00081-JTM

MOTION FOR DETENTION

The Government respectfully moves to order the pretrial detention of defendant Isse Aweis Mohamud, and states the following in support of the motion:

1. A criminal complaint has been filed charging the defendant with passport fraud, in violation of 18 U.S.C. § 1542.

2. Based on the defendant's recent overseas travel, among other factors, this case involves a serious risk that the defendant will flee. *See* 18 U.S.C. §§ 3142(f)(2)(A).

3. The Government submits that there is clear and convincing evidence that there are no conditions which the Court could place on the defendant's release which would reasonably assure the defendant's appearance in Court and the safety of the community. *See* 18 U.S.C. § 3142(g) (citing factors to consider including nature and circumstances of offense, weight of evidence, defendant's history and characteristics, and danger to any person or community). Because of this, the Government requests that a Detention Hearing be held and that the defendant be detained. *See generally United States v. Sazenski*, 806 F.2d 846, 848 (8th Cir. 1986); *United States v. Warren*, 787 F.2d 1337, 1338 (8th Cir. 1986).

4. The Government further requests, pursuant to 18 U.S.C. § 3142(f)(2), an order continuing for a period of three days following the defendant's first appearance (not including any intermediate Saturday, Sunday, or legal holiday) the hearing on this detention motion, which continuance will permit the Government to fully prepare an evidentiary presentation in support of pretrial detention.

WHEREFORE, based on the foregoing, the Government respectfully requests that the Court hold a Detention Hearing in accordance with 18 U.S.C. § 3142(f), and following such hearing, order the detention of the defendant.

Respectfully submitted,

Thomas M. Larson
Acting United States Attorney

By ***/s/ David Raskin***

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CERTIFICATE OF SERVICE

The undersigned hereby certifies that a copy of the foregoing was delivered to the Court on May 5, 2017, for filing to the Electronic Filing System (CM/ECF) of the United States District Court for the Western District of Missouri for electronic delivery to all counsel of record.

/s/ David Raskin
David Raskin
Assistant United States Attorney